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9 Attorneys for WAYMO LLC

10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

CASE NO. 3:17-cv-00939-WHA

13 Plaintiff,

**DECLARATION OF LINDSAY COOPER
IN SUPPORT OF PLAINTIFF WAYMO
LLC'S ADMINISTRATIVE MOTION TO
FILE UNDER PREVIOUSLY-FILED
DOCUMENTS**

14 vs.

15 UBER TECHNOLOGIES, INC.;
OTTOMOTTO LLC; OTTO TRUCKING
16 LLC,

17 Defendants.

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1 I, Lindsay Cooper, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
 3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,
 4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set
 5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Waymo’s Administrative Motion to File Under
 7 Seal certain information in previous filings that counsel for defendants have subsequently identified as
 8 confidential (“Waymo’s Administrative Motion”). Waymo’s Administrative Motion seeks an order
 9 sealing the following materials:

Document	Portions to Be Filed Under Seal	Designating Party
Revised version of Dkt. 1552-1	Highlighted in Blue	Defendants
Revised version of Dkt. 1589	Highlighted in Blue	Defendants

13 3. Waymo’s Motion and exhibits contain information that counsel for Defendants have
 14 subsequently designated as confidential and/or highly confidential.

15 4. Waymo takes no position on the merits of sealing Defendants’ designated material, and
 16 expects Defendants to file one or more declarations in accordance with the Local Rules.

17 I declare under penalty of perjury under the laws of the State of California that the foregoing is
 18 true and correct, and that this declaration was executed in San Francisco, California, on September 18,
 19 2017.

20 By /s/ Lindsay Cooper

21 Lindsay Cooper
 22 Attorneys for WAYMO LLC

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26 **SIGNATURE ATTESTATION**

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1 Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the
2 filing of this document has been obtained from Lindsay Cooper.

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4 /s/ Charles K. Verhoeven
5 Charles K. Verhoeven
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